

# **The Comprehensive System of Personnel Development**

## **A Practical Guide**

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According to statute and regulations, the State must develop a CSPD). This system is intended to ensure an adequate supply of qualified rehabilitation personnel. State VR agencies must submit and update the CSPD attachment. Each attachment must include information on the following topics:

- **Data System** on Personnel and Personnel Development
- Plans for **Recruitment and Retention** of Qualified staff
- **Personnel Standards** to Assure Personnel are Adequately Prepared and Trained
- **Staff Development Plan**
- Personnel to Address **Individual Communication Needs**
- **Performance Evaluation System**
- **Coordination of the CSPD** with IDEA and Inservice Training
- Opportunity for **Review of Plan by SRC**

The details of each section are presented below. At the end of this appendix is a "CSPD Checklist" that summarizes the information that should be in a CSPD attachment.

### **DATA SYSTEM:**

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The CSPD requires that State units maintain a data system on personnel needs and resources. Specifically, the data system must include:

- Personnel Data and Projections
  - number of personnel in relation to number of clients served
  - number of staff currently needed to meet customer need
  - a five year projection of personnel needs
- Personnel Sources
  - a list of higher education programs that train rehabilitation personnel
  - the number of students enrolled in and the number graduating during the prior year from those programs by type of program

At a minimum, the State CSPD attachment must describe the development and maintenance of such a system. RSA encourages State VR agencies to include a summary of the data to assist in national planning efforts.

### **RECRUITMENT AND RETENTION:**

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The CSPD also requires that state units have plans for recruitment and retention of qualified staff to address personnel needs. Specifically the plan must include coordination with:

- Institutions of Higher Education
- Professional Associations

These plans must include special efforts to recruit, prepare and retain:

- personnel from minority backgrounds
- individuals with disabilities

The State CSPD attachment must describe such plans.

## **PERSONNEL STANDARDS:**

State Units must establish personnel standards that assure personnel are adequately prepared and trained. The standards must be consistent the highest entry-level academic degree needed for any national or State-approved or -recognized certification, licensing, or registration specific to a profession. For rehabilitation counselors, this means that if State approved or recognized certification, licensing or registration requirements do exist within the State (such as licensing standards for rehabilitation counselors in the private sector or in other State agencies), then the State VR agency must base its personnel standards for counselors on one of the following:

- the highest entry-level degree needed under the existing State requirements;
- a degree that exceeds the degree needed under the existing State requirements; or
- the degree required for the national CRC requirement -- a master's degree in rehabilitation counseling or another masters degree that meets CRC specifications (see the CRC criteria at the end of this document).

If there are no State-approved or -recognized certification, licensing or registration requirements for rehabilitation counselors, the State VR agency must base its personnel standards for counselors on:

- the degree needed to meet the national CRC requirements -- a master's degree in rehabilitation counseling or another master's degree that meets CRC specifications (see the CRC criteria at the end of this document); or
- new State certification, licensing or registration requirements for rehabilitation counselors developed by the appropriate certification, licensing, or registration body of the State.

### **New personnel:**

RSA expects new personnel hired by the State to meet the standard. However, if there are reasons why a State cannot hire at that level, they must present an acceptable justification, establish a baseline standard for such hires and develop plans that swiftly move such hires to the standard. States must also establish a strategy to move them to a position in which they would no longer need to hire below the standard.

### **Existing personnel:**

RSA expects existing personnel to be retrained to the standard. Staff members who do not meet the standard must be under an approved state plan to achieve the standard.

While the statute requires standards for all professional and paraprofessional staff, RSA is focusing initial efforts on Rehabilitation Counselors. It is important to note that RSA's current position on who is considered to be a rehabilitation counselor is anyone who does one or more of the following:

- Makes an eligibility determination
- Approves an IPE and any amendments to the IPE
- Makes the determination as to who is an individual with a significant disability
- Makes the determination as to who is an individual with a most significant disability
- Makes the determination, in consultation with the individual, of ineligibility
- Makes the determination, in consultation with the individual, that the record of service of an individual who has achieved an employment outcome can be closed

The CSPD attachment must include the following:

- a statement of personnel standards for counselors that are based on the highest requirements in the State applicable to the particular profession, i.e., the highest entry-level academic degree needed for any national or State-approved or State-recognized certification, licensing, registration, or other comparable requirements

- an analysis of the extent to which its counselors do not meet the highest requirements in the State
- an identification and analysis of factors (such as shortages of qualified personnel, low pay scales, etc.) that may inhibit its ability to hire qualified staff
- short-term and long-term strategies for addressing these factors
- objectives and activities for getting all of its counselors to the level of the standard that moves the State effectively toward compliance with the CSPD requirements and will result in counselors meeting the necessary standard in a timely fashion
- a commitment of funds to support the CSPD plan
- an evaluation mechanism to determine whether the CSPD plan's objectives are being met
- evidence that the CSPD plan encourages retraining and hiring of staff from minority backgrounds and staff with disabilities

#### **STAFF DEVELOPMENT:**

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State units must develop plans for staff development to assure that existing staff receives adequate and ongoing training. The plan must be based on an assessment of the needs of the state unit, and must address the issues of retention of qualified staff, succession planning and leadership development and capacity building.

The CSPD places particular emphasis on staff training in the following areas:

- Assistive Technology
- Current Research
- 1998 Amendments to the Rehabilitation Act
- Workforce Investment Act
- Informed choice
- Culturally diverse populations

The State CSPD attachment must describe its system of staff development.

#### **INDIVIDUAL COMMUNICATION NEEDS:**

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State Units must hire and retain staff trained to communicate with diverse populations, or obtain the services necessary to do so. This includes communication in the following:

- Native languages
- Sign language and other alternative modes of communication

The CSPD attachment must describe its efforts in this area.

#### **PERFORMANCE EVALUATION SYSTEM:**

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The State must describe how the system for evaluating the performance of rehabilitation personnel in no way impedes the accomplishment of the purpose of the program.

#### **COORDINATION OF THE CSPD:**

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The law requires coordination among the CSPD, the State's inservice training program and IDEA. IDEA also requires coordination of the IDEA CSPD with the CSPD of State VR agencies. The CSPD attachment must describe its efforts in this area.

**REVIEW OF PLAN BY SRC:**

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Finally, the Act requires that the State Rehabilitation Council (SRC) have the opportunity to review and comment upon the State's CSPD. The State's CSPD attachment indicates that the SRC has been provided this opportunity.

The attached "CSPD Checklist" may help State agencies develop their CSPD. Technical assistance is available through the RSA regional offices.